<u>REMARKS</u>

Claims 1 to 4, 7 to 34 and 36 to 63 are pending in this application. Claims 1, 31 and 55

are the independent claims. Claims 5, 6 and 35 are cancelled without prejudice. Favorable

consideration and further examination are respectfully requested.

Paragraph [0090] of the specification was objected to for allegedly describing

devices not yet known. Based on the foregoing amendment to the specification,

Applicants respectfully request withdrawal of the specification objection.

Claims 1 to 18, 20, 21, 30 to 44, 46 to 48, 54 to 60, and 63 were rejected as being

obvious under 35 U.S.C. §103(a) over Luo et al. (U.S. Patent No. 7,139,819 hereinafter

"Luo") in view of Goldstein et al. (U.S. Patent 7,197,559 hereinafter "Goldstein").

Amended claim 1 is directed to a method of displaying alert information for objects in a

network. The method includes storing performance information for the network objects at

predetermined time intervals and determining at least one potential root cause of one or more

triggers in the network. The method also includes displaying a topographical network map

including a host region including network objects associated with hosts in the network, a storage

region including network objects associated with storage devices in the network and a

connectivity region including network objects associated with connectivity devices in the

network configured to be connected to at least one of the hosts and the storage devices in the

network. The network objects in the topographical network map are associated with at least one

of the one or more triggers.

The applied art is not understood to disclose or to suggest the foregoing features of

claim 1. In particular, neither Goldstein nor Luo discloses or suggests displaying a topographical

network map including a host region including network objects associated with hosts in the

network, a storage region including network objects associated with storage devices in the

network and a connectivity region including network objects associated with connectivity

devices in the network configured to be connected to at least one of the hosts and the storage

devices in the network.

Luo discloses a system that associates an event with a network device and provides a

geographical map (see Abstract of Luo). The Examiner has directed Applicants to FIG. 8 of Luo

which shows a network topology window 810 (see page 3 of the Office Action). However,

neither the corresponding text nor FIG. 8 teaches that the network topology map includes regions

much less a host region, a connectivity region and a storage region. Therefore, Luo does not

disclose or suggest a topographical network map that includes a host region including network

objects associated with hosts in the network, a storage region including network objects

associated with storage devices in the network and a connectivity region including network

objects associated with connectivity devices in the network configured to be connected to at least

one of the hosts and the storage devices in the network.

The Examiner cites the Goldstein reference to support storing performance information

for the network objects at predetermined time intervals and to show root cause analysis.

However, Goldstein does not disclose or suggest displaying a topographical network map much

less a topographical network map that includes that includes a host region including network

objects associated with hosts in the network, a storage region including network objects

associated with storage devices in the network and a connectivity region including network

objects associated with connectivity devices in the network configured to be connected to at least

one of the hosts and the storage devices in the network.

Accordingly, for at least the reasons indicated above, even if Luo were combined with

Goldstein, the resulting hypothetical combination would not disclose or suggest displaying a

topographical network map including a host region including network objects associated with

hosts in the network, a storage region including network objects associated with storage devices

in the network and a connectivity region including network objects associated with connectivity

devices in the network configured to be connected to at least one of the hosts and the storage

devices in the network.

Furthermore the cited art does not disclose or suggest that the network objects in the

topographical network map are associated with at least one of the one or more triggers. The

Examiner references FIG. 7 of Luo which includes a geographic map 710 (see page 3 of the

Office Action). Applicants respectfully submit that a geographic map is not a topographical

network map. Claim terms are interpreted as broadly as reasonably allowed and the words of a

claim must be given their plain meaning unless the plain meaning is inconsistent with the

specification (In re American Academy of Science Tech Center, 367 F.3d 1359, 1369, 70

USPQ2d 1827, 1834 (Fed. Cir. 2004), In re Zletz, 893 F.2d 319, 321, 13 USPQ2d 1320, 1322

(Fed. Cir. 1989) and MPEP §2111.01). "[T]he ordinary and customary meaning of a claim term

is the meaning that the term would have to a person of ordinary skill in the art in question at the

time of the invention, i.e., as of the effective filing date of the patent application." Phillips v.

AWH Corp., 415 F.3d 1303, 1313, 75 USPQ 2d 1321, 1326 (Fed. Cir. 2005) (en banc).

Applicants respectfully submit that a person of ordinary skill in the art reasonably understands

that a geographical map is directed towards geographic locations whereas a topographical

network map is directed to a network topology.

Claims 31 and 55 have corresponding features to claim 1. Applicants submit that the Luo

and the Goldstein references should also be withdrawn with respect to claims 31 and 55 for at

least the same reasons as claim 1.

For at least the foregoing reasons, Applicants request withdrawal of the art rejection.

Applicants submit that all dependent claims now depend on allowable independent

claims.

It is believed that all of the pending claims have been addressed. However, the absence

of a reply to a specific rejection, issue or comment does not signify agreement with or

concession of that rejection, issue or comment. In addition, because the arguments made above

may not be exhaustive, there may be reasons for withdrawing the prior art cited with regards to

any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this

paper should be construed as intent to concede any issue with regard to any claim, except as

specifically stated in this paper, and the amendment of any claim does not necessarily signify

concession of unpatentability of the claim prior to its amendment.

Applicants submit that the entire application is now in condition for allowance. Such

action is respectfully requested at the Examiner's earliest convenience.

Applicants : Jennifer Arden et al.
Serial No. : 10/812,503
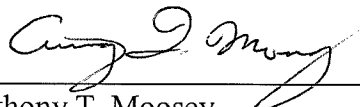Filed : March 30, 2004
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Attorney's Docket No.: EMC-040PUS

All correspondence should be directed to the address below. Applicants' attorney can be reached by telephone at (781) 401-9988 ext. 123.

Enclosed is an electronic payment for a Three-Month Extension of Time fee. No other fee is believed to be due for this Response; however, if any other fees are due, please apply such fees to Deposit Account No. 50-0845 referencing Attorney Docket: EMC-040PUS.

Respectfully submitted,

Date:_____22 May 2008_____

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